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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

Civil Case No. 10-cv-544-ST

Plaintiff,

v.

**JANET DAVIS MAJHOR,
aka Janet Davis Majhor, and
Janet-Davis: Majhor,**

**MOTION FOR EXTENSION
OF TIME**

Defendant.

I. LOCAL RULE 7.1 CERTIFICATION

Pursuant to LR 7.1, I have made a good faith effort to discuss this motion with plaintiff. I called her and left a message on her voice mail indicating my intent to request a delay, however I have received no call in response.

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II. MOTION

The United States of America, by Dwight C. Holton, United States Attorney, through Scott Erik Asphaug, Assistant United States Attorney, hereby moves for an extension of 30 days in which to respond to Defendant's Motion to Dismiss with Prejudice and Motion for Trial by Jury.

On November 5, 2010, defendant responded to plaintiff's Motion for Summary Judgment and for a Permanent Injunction (filed on October 12, 2010). Her response included a Motion to Dismiss with Prejudice as well as a Motion for Trial by Jury. Due to the fact that Counsel of plaintiff's is scheduled to begin a trial in the matter of *United States v. Lucescu* (CR 09-247-MO) on November 30, 2010, Counsel for plaintiff is unable to research and respond to defendant's pleadings in the limited time available for such a response. For that reason, plaintiff requests an extension of 30 days in which to respond to both of defendant's pleadings filed on November 5, 2010.

Dated this 16th day of November, 2010.

Respectfully submitted,

DWIGHT C. HOLTON, OSB #09054
United States Attorney
District of Oregon

/s/ Scott Erik Asphaug
SCOTT ERIK ASPHAUG, OSB# 83367
Assistant United States Attorney